Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 11 of the Commission's Rules	)	PS Docket No. 15-94
Regarding the Emergency Alert System	)	

Gorman Redlich Mfg. Co.

Comments

Concerning the
Notice of Proposed Rulemaking
Regarding the
Emergency Alert System

INTRODUCTION

These comments to the Commission's Notice of Proposed Rulemaking to revise the Federal Communications Commission's Emergency Alert System (EAS) are by James Gorman of the Gorman Redlich Manufacturing Company. Gorman Redlich is a manufacturer of FCC certified EAS encoder-decoders and CAP converters and has had experience in emergency alerting for close to 40 years.

COMMENTS

I. Comments on Paragraph 70

The question of whether alerts should be mandated by the FCC to be transmitted in multiple languages over broadcast stations raises the following question:

The Hmong people arrived in the US after we left Vietnam which was in the 1970's, a period which is forty years in the past. The original arrivals could well be grandparents and surely their offspring went to school in the US and can read and write in English. How many Hmong people of the original group live alone? Is their language a written language that you could crawl on a TV screen? Many people who came here cannot read or write in their native language. Migrating to another country requires a migrant to adapt to their new surroundings and we should not encourage the creation of enclaves of people isolated from the native culture. It is the responsibility of immigrants to adapt. If technology enables alternate alerting over cell phones or other means of communication, in a way that allows the recipient to choose the language in which he wants to receive the message and only people who want the alert in that language receive it, I think that's great. I do not believe that broadcast stations should be forced to transmit alerts in multiple languages.

I would like to point out that participating in EAS requires the forwarding of 5 event codes. The other 49 event codes are optional and all the warning codes are in the optional table. Do we want broadcast stations to ignore the optional codes if they have to transmit messages in multiple languages?

II. Comments on Paragraphs 98-102

When we originally designed our EAS system, we keyed on the "EAN" event code and our unit would lock on that channel and simultaneously receive and transmit the audio from that Channel until an EOM was received. Someone baptized this as treating the EAN Codes as a "Wild Card". With subsequent requirement that the EAS could be addressed to a subset of the 50 states we included filtering so the EAS event would only be forwarded if the header code contained either the 6 zero (000000) national code or the Entire State where the EAS is installed. After the "Bobby Bones" event, we added an additional filter to attenuate the chances that a recorded event from the past could be forwarded. We compare the current Julian date to the Julian date in the incoming message. If the Julian date in the incoming message is outside of the time period defined by the current Julian date $\pm$ one day, the message is rejected. The $\pm$ one day is introduced to accommodate a message sent around midnight where there may be a difference in the sending and receiving clocks.

This would have eliminated the "Bobby Bones" incident and is a very economical solution to receiving an accidental sending an EAN alert from the past

III. Comments on Paragraph 100

In the past 20 years our EAS box never had the EAN code in the Table of Event Codes available for creating a message if the broadcast station is not a "PEP" For the past 20 years we have had a 4 digit code that had to be entered before anyone could forward a message composed using the front panel keypad. I don't think anything else has to be done to prevent the unintentional creation of a false message by over the air transmission. Removing the EAN event code from the list of codes available to create a message at stations that are not a PEP will be very inexpensive.

IV. Comments on Paragraph 110

To make it more difficult for the creation of a deliberate malicious EAS alert over the air, I think there should be a tight tolerance placed on the generated FSK tones that make up the Header Code of an EAS message. The 2 tones are defined down to a tenth of a cycle in Part 11 and I, and some of the other manufacturers, hold the tones to within a tenth of a cycle of the specified frequency over the 0 degree to 50 degree centigrade required in the Part 11 specification and are able to hold the tone frequencies that close over the longest burst of FSK.

With this tight tolerance, the filtering on the decoder could be narrowed to make it more difficult for mischief makers to put a bogus alert on the system. The expense of creating a tolerance on FSK tones and narrowing the filters on the receiving of EAS messages will be small.